



**Service of Process
Transmittal**

09/17/2015

CT Log Number 527829218

TO: Eric Thomsen, Vice President and General Counsel
Kent Corporation
1600 Oregon St
Muscatine, IA 52761-1404

RE: Process Served in Ohio

FOR: Grain Processing Corporation (Domestic State: IA)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: JANE MILLER, On behalf of herself and others similarly situated, Pltf. vs. KENT NUTRITION GROUP, INC., et al., Dfts. // To: GRAIN PROCESSING CORPORATION

DOCUMENT(S) SERVED: Summons, Complaint, Exhibit(s)

COURT/AGENCY: Lorain County Court of Common Pleas, OH
Case # 15CV187391

NATURE OF ACTION: Class Action - Breach of the Implied Warranty of Merchantability - False advertisement of the World's Best Cat Litter for it being Tested & Proven Flushable Septic Safe

ON WHOM PROCESS WAS SERVED: C T Corporation System, Cleveland, OH

DATE AND HOUR OF SERVICE: By Certified Mail on 09/17/2015 postmarked on 09/15/2015

JURISDICTION SERVED : Ohio

APPEARANCE OR ANSWER DUE: Within 28 days after service, exclusive of the day of service (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Dennis E. Murray, Sr.
MURRAY & MURRAY CO., L.P.A.
111 East Shoreline Drive
Sandusky, OH 44870
(419) 624-3000

ACTION ITEMS: SOP Papers with Transmittal, via Fed Ex 2 Day , 781347672370

Image SOP

Email Notification, John Kuhl john.kuhl@kentww.com

Email Notification, Eric Thomsen eric.thomsen@kentww.com

Email Notification, Sara Bauer sara.bauer@kentww.com

SIGNED: C T Corporation System
ADDRESS: 1300 East 9th Street
Suite 1010
Cleveland, OH 44114
TELEPHONE: 216-802-2121

Page 1 of 1 / RR

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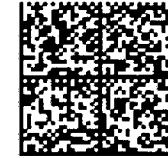
EXHIBIT A



TOM ORLANDO
Lorain County Clerk of Courts
225 Court Street - First Floor
Elyria, OH 44035-5512



9414 7266 9904 2024 9206 73



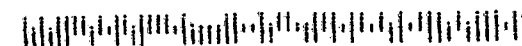
U.S. POSTAGE >> PITNEY BOWES



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15CV187391
GRAIN PROCESSING CORPORATION
CT CORPORATION SYSTEM
1300 EAST 9TH ST.

CLEVELAND OH 44114





LORAIN COUNTY COURT OF COMMON PLEAS

LORAIN COUNTY JUSTICE CENTER

225 COURT STREET
ELYRIA, OHIO 44035

JANE MILLER
ON BEHALF OF HERSELF & OTHERS IN
SIMILARLY SITUATED
71 GLENHURST DR.
OBERLIN, OH 44074

CASE NO. 15CV187391

VS.

TO: CT CORPORATION SYSTEM
1300 EAST 9TH ST.
CLEVELAND, OHIO 44114

SUMMONS ON COMPLAINT

You have been named defendant in a complaint filed in Lorain County Court of Common Pleas by plaintiff(s):

JANE MILLER
ON BEHALF OF HERSELF & OTHERS IN SIMILARLY SITUATED
71 GLENHURST DR.
OBERLIN, OH 44074

A copy of the complaint is attached hereto. The name and address of the plaintiff's attorney is:

DENNIS E MURRAY SR
MURRAY & MURRAY CO., L.P.A.
111 EAST SHORELINE DRIVE
SANDUSKY, OH 448710019

You are hereby summoned and required to serve a copy of your answer to the complaint upon the plaintiff's attorney, or upon the plaintiff, if he has no attorney of record, within **TWENTY-EIGHT (28) DAYS** after service of this summons on you, exclusive of the day you receive it. Your answer must **ALSO** be filed with this Court within three (3) days after you serve, (delivered or by mail), a copy of your answer on the plaintiff's attorney.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

TOM ORLANDO
CLERK OF COURTS OF COMMON PLEAS
LORAIN COUNTY, OHIO

9/11/2015

BY: _____


Deputy Clerk



LORAIN COUNTY
COURT OF COMMON PLEAS

FILED
LORAIN COUNTY
2015 SEP -3 A 11:30
COURT OF COMMON PLEAS
TOM ORLANDO

JANE MILLER
71 Glenhurst Dr.
Oberlin, OH 44074

On behalf of herself and others similarly
situated,

Plaintiffs,

vs.

KENT NUTRITION GROUP, INC.
1600 Oregon Street
Muscatine, IA 52761

and

KENT PET GROUP, INC.
2905 US Highway 61 North
Muscatine, IA 52761

and

GRAIN PROCESSING CORPORATION
1600 Oregon Street
Muscatine, IA 52761

ALSO SERVE:

Eric J. Thomsen
1600 Oregon Street
Muscatine, IA 52761

and

E.J. Thomsen
2905 US Highway 61 North
Muscatine, IA 52761

150 v. 1873 91
CASE No.:
JUDGE

JUDGE JAMES M. BURGE

CLASS ACTION COMPLAINT
(Jury Demand Endorsed Hereon)

Dennis E. Murray, Sr. (0008783)
dms@murrayandmurray.com
Donna Jean A. Evans (0072306)
dae@murrayandmurray.com
MURRAY & MURRAY CO., L.P.A.
111 East Shoreline Drive
Sandusky, Ohio 44870
Telephone: (419) 624-3000
Facsimile: (419) 624-0707

Attorneys for Plaintiffs

Defendants.

certification and sale of a product that they call the World's Best Cat Litter ("World's Best") which is a line of cat litter products formulated, created, marketed, certified and sold by the Defendants.

2. Through an extensive, widespread, comprehensive and uniform marketing and sales campaign, the Kent Defendants have and continue to tout World's Best as a renewable, planet-friendly product, which is made from corn, as an alternative to clay cat litter. The Kent Defendants have and continue to proclaim that their product is completely flushable. The Kent Defendants have warranted, on their website and in print, that all six of the World's Best formulas were subjected to a thorough and rigorous testing procedure *to assure* that their litter, when flushed down residential toilets, *would not clog* pipes, sewers, or septic systems *after being flushed*.

3. World's Best is marketed and sold throughout the United States in large chain stores as well as in small independent establishments. World's Best has a nationwide distribution network which includes many well-known stores such as Walmart, Target, Petco, PetSmart, Pet Supplies Plus and Kroger. It is also available for purchase online through sites such as Amazon.com, Wag.com and Pet Food Direct.

4. On its website, the Kent Defendants have and continue to represent that "NSF is the public health and safety organization that tests consumer products for flushability." (Exhibit 1). Bags of World's Best Cat Litter have and continue to display prominent stickers representing that such cat litter is "Tested & Proven Flushable Septic Safe" with some stickers that prominently display the NSF seal. (Exhibit 2).

5. A link from the Kent Defendants' website takes the consumer to the NSF website which discloses that NSF International is a company headquartered in Ann Arbor, Michigan that

is an independent, accredited organization that develops standards, and tests and certifies products and systems. Products that are tested and meet the NSF standards are entitled to display the NSF certification mark.

6. Nevertheless, the NSF website does not presently list World's Best as one of its certified products despite the representations currently made by the Kent Defendants. NSF did not properly or thoroughly test the product before allowing it to display the NSF mark. Upon information and belief, NSF failed to protect Plaintiff and Class Members by allowing and continuing to allow the Kent Defendants to improperly use the NSF certification mark. World's Best, therefore, is not as advertised.

7. In addition, the Kent Defendants' representations in other respects are false and misleading. World's Best, if flushed, does clog up pipes and septic systems, despite the claims made by these Defendants. Consumers have posted complaints about clogged toilets and plumbing on various internet blogs and even on the World's Best Cat Litter website itself. (Exhibit 3).

8. Upon information and belief, owing to all Defendants' false and misleading statements and representations, Plaintiff and the Class bought hundreds of bags of World's Best Cat Litter, based upon the representations of all Defendants that they were NSF-certified, when they were not.

9. Owing to all Defendants' false and misleading statements and representations, Plaintiff and the Class paid a premium to purchase hundreds of bags of World's Best Cat Litter, based upon the Kent Defendants' representations that it was safe to flush in their plumbing, when it was not.

10. Because of all Defendants' false and misleading statements and representations, Plaintiff, and upon information and belief, Class Members, have flushed World's Best down their toilets, causing the cat litter to build up in the plumbing and causing blockages which have required expensive repairs to remedy.

11. Plaintiff seeks relief in this action individually, and as a class action, on behalf of all persons in the United States who, within the relevant statute of limitations period, purchased World's Best Cat Litter; for disgorgement of the unjust enrichment of the Kent Defendants; for their breach of the implied warranty of merchantability; and for violations of the Private Right of Action for Consumer Frauds Act, Iowa Code §§714H.1 *et seq.*

12. Plaintiff seeks relief in this action against NSF for negligent misrepresentation.

13. Plaintiff seeks actual damages for herself and for the Class, including but not limited to reimbursement for the expenses of necessary plumbing repairs; for cost and for the premiums paid for the Kent Defendants' products; a declaratory judgment that the Kent Defendants' practices violate the implied warranty of merchantability; for a finding that they violated the Iowa statutes; for an order enjoining all Defendants from further violations; for costs and expenses of litigation, including attorneys' fees; and for such other and further appropriate relief as may be equitable or appropriate.

THE PARTIES

14. Plaintiff Jane Miller is a resident of Oberlin, Ohio and has owned a cat at all times pertinent hereto. Plaintiff purchased World's Best from the Four Legged Café in Oberlin, Ohio and other pet stores in the area and used it exclusively for many years. Plaintiff, in reliance on Defendants' conduct and misrepresentations, flushed small amounts of the cat litter in the toilet

in her home daily. The conduct and misrepresentations include those found on the product labeling and those found on the websites of the Kent Defendants.

15. Plaintiff and the Members of her Class paid a significant premium because of the false and misleading representations and warranties made by all Defendants. In fact, the World's Best products were worth *significantly less* than its representations and warranties would have suggested, and neither the Plaintiff, nor the Members of her Class, would have purchased the product, especially at a premium, and then have flushed such cat litter products down a toilet.

16. Defendant Kent Nutrition Group, Inc. ("Kent") is a corporation organized and existing under the laws of Iowa, with its home office located at 1600 Oregon Street, Muscatine, IA 52761. The Pet Division of Kent develops products for dog, cat, and small animal owners. World's Best is distributed by Kent Nutrition Group, a subsidiary of Kent Corporation, a diversified family owned corporation.

17. Defendant Kent Pet Group, Inc. ("Kent Pet Group") is a corporation organized and existing under the laws of Iowa, with its home office located at 2950 US Highway 61 North, Muscatine, IA 52761. Kent Pet Group markets products for dog, cat, and small animal owners. World's Best is marketed by Kent Pet Group, a subsidiary of Kent Corporation.

18. Defendant Grain Processing Corporation ("Grain Processing") is a corporation organized and existing under the laws of Iowa, with its home office located at 1600 Oregon Street, Muscatine, IA 52761. Defendant Grain Processing is registered to do business in Ohio as entity number 1241983, with a registered agent in Ohio designated as CT Corporation System, 1300 East 9th Street, Cleveland, OH 44114. Grain Processing has registered World's Best Cat Litter as a fictitious name with the Iowa Secretary of State. Grain Processing is another operating subsidiary of Kent Corporation.

19. Defendant NSF International (“NSF”) is an independent accredited public health and safety organization that develops standards and tests and certifies products and systems to help protect the world’s food, water, consumer products and environment. NSF’s world headquarters is located at 789 N. Dixboro Road, Ann Arbor, MI 48105. NSF is a non-profit corporation organized and existing under the laws of Michigan as entity number 704075.

JURISDICTION AND VENUE

20. Venue is proper in this Court pursuant to Ohio Civ. R. 3(B)(3), in that Defendants conducted activity in Lorain County that gave rise to the claims for relief.

21. This Court has jurisdiction over this matter because the claim that is the subject of this action arose from the Defendants’ business conducted in this state. Defendant have caused injury to customers within this state and derive substantial revenue from goods sold in this state.

FACTUAL ALLEGATIONS

22. During the Class Period defined herein, Defendants have manufactured, labeled, distributed and sold and/or in the case of NSF has facilitated the same as to World’s Best Cat Litter.

23. World’s Best packaging prominently identifies the World’s Best products as “Flushable,” “Septic Safe” and NSF-certified.

24. Upon information and belief, Defendant NSF did not rigorously test World’s Best to be safe for plumbing and septic systems. NSF’s certification was false and misleading. World’s Best, if flushed, is not safe for plumbing and septic systems.

25. The Kent Defendants falsely manufactured, labeled and sold World’s Best. World’s Best is and has been sold at a premium price, which greatly exceeded actual value.

26. The Kent Defendants have consistently marketed World's Best as a flushable and "septic-safe" product. It is marketed as an environmentally-friendly brand of cat litter. These claims are reasonably calculated to induce consumers to purchase the World's Best product at a premium.

27. Upon information and belief, the Kent Defendants representations about the flushability and septic-safe nature of World's Best have caused consumers to conclude that World's Best is an environmentally superior choice of cat litter.

28. In 2011, the National Advertising Division ("NAD") of the Council of Better Business Bureaus sought to review the environmental claims made by the Kent Defendants about World's Best to determine if the claims were substantiated. The Kent Defendants refused to participate, and the NAD referred the claims to the Federal Trade Commission ("FTC") for further review.

29. Section 5 of the Federal Trade Commission Act ("FTCA"), 15 U.S.C. §45, prohibits deceptive acts or practices in interstate commerce, including deceptive advertising claims. The FTC investigated the Kent Defendants' environmental claims to determine if they were truthful, not misleading, and supported by reliable scientific evidence. The investigation was assigned File Number 112-3161.

30. On November 9, 2011, the FTC issued a letter stating that the Kent Defendants' environmental claims were misleading, unsubstantiated, and not backed by credible scientific evidence. (Exhibit 4). The FTC found that the Kent Defendants had not conducted the testing necessary to determine World's Best was flushable and septic-safe.

31. With regard to the claim that World's Best was "flushable and septic-safe," the FTC found that the Kent Defendants did not possess test results addressing consumer's

reasonable and expected usage of the product, “which here would include daily flushing of cat litter potentially for years, and the effects of long-term, large-scale introduction of cat litter into individual septic or wastewater treatment systems.” *Id.*

32. Based on the findings of the FTC above, the Kent Defendants voluntarily agreed to cease making claims that World’s Best was flushable and septic-safe, to conduct additional testing with an outside expert and to only resume these claims if the testing results support them. The FTC did not initiate enforcement action in reliance of the Kent Defendants’ voluntary promises to cease making claims regarding the flushability and septic-safe qualities of World’s Best until it obtained test results substantiating those claims. *Id.*

33. Despite having so agreed, the Kent Defendants continue to make representations and warranties that World’s Best is flushable; and to nevertheless be septic- and sewer-safe. The Kent Defendants have and continue to represent that such representations have been substantiated by NSF’s testing and certification process. (Exhibit 5).

34. The Kent Defendants currently claim that “All World’s Best Cat Litter formulas have undergone rigorous testing to confirm they are sewer and septic safe.” Upon information and belief, any testing conducted did not support the validity of the representations and warranties being made by the Kent Defendants as to the effect of long-term, large-scale introduction of cat litter into individual septic or wastewater treatment systems as required by the FTC.

35. The Kent Defendants continue to market and sell at a premium World’s Best as being flushable and septic-safe, with instructions for use which encouraged the disposal of cat waste and litter by flushing it down the toilet.

36. In contrast to the warranties and representations of all Defendants, and previously unknown to the Plaintiff and her Class Members, numerous municipal sewer and wastewater treatment systems have admonished users not to flush cat waste and litter down the toilet, even when those litters are marketed as “flushable,” *because* these products do clog sewer systems and treatment plants. (Exhibit 6).

37. Plaintiff and the Class relied upon the warranties and representations on the product’s label to their detriment.

38. Plaintiff Miller has used World’s Best exclusively for approximately ten years. On or around April 24, 2015 Plaintiff discovered that her plumbing was clogged and raw sewage was backing up into her home through her toilet and bathtub drain.

39. On or about April 24, 2015, it became necessary for Miller to call a plumber to diagnose the plumbing problem. The plumber attempted to clear the lines, but was initially unable to remedy the problem.

40. On or around April 29, 2015, the plumber and his assistant returned with a sewer machine. By running the sewer machine through Plaintiff’s plumbing, along with a camera, the plumber determined the lines were clogged with cat waste and litter. He removed the cat waste and litter from Plaintiff’s plumbing.

41. Plaintiff incurred \$585 in expenses for the plumber to clean the cat waste and litter from her pipes and sewer lines. (Exhibit 7).

42. Plaintiff wrote to the Kent Defendants and explained that her plumbing system had been harmed by her use of World’s Best when used as directed. In response, the Kent Defendants represented and warranted that “consumers have been flushing our products for over sixteen years with great success” and that “[w]e have conducted and completed rigorous testing

on our litter in sewers, septic systems and with plumbing in general, which has allowed us to support the claim.” (Exhibit 8).

43. The Plaintiff believes and therefore alleges that there are thousands of Class Members who have experienced plumbing problems caused by the use of World’s Best products and who have each incurred hundreds of dollars to remedy.

44. Plaintiff and the Class have been damaged by the false and deceptive labeling of World’s Best. Plaintiff and the Class are entitled to reimbursement for expenses incurred and a return of a portion of the inflated purchase price paid for the World’s Best product.

CLASS ACTION ALLEGATIONS

45. Pursuant to Ohio Rule of Civil Procedure 23, Plaintiff seeks to represent a class of all persons in the United States who purchased, during the applicable statute of limitations period, one or more of the World’s Best Cat Litter products for personal, family or household use and not for resale.

46. The Members of the Class are so numerous that joinder of all members would be impracticable. Plaintiff estimates that there are hundreds of purchasers of the product at issue.

47. The claims of Plaintiff and the Class raise common questions of law and fact that predominate over any questions affecting only individually the Plaintiff and the Class Members, including:

- a. Whether Defendants’ labeling of World’s Best as NSF-certified causes a likelihood of confusion as to the approval or certification of that product;
- b. Whether the description of World’s Best as “Flushable”, “Septic Safe” and/or NSF-certified was likely to be material to a consumer’s decision to purchase the product;

- c. Whether all Defendants made false and/or misleading statements of fact to the Class concerning the nature of World's Best;
- d. Whether Defendants knew that consumers were likely to rely to their detriment on these false and misleading statements;
- e. Whether the Kent Defendants' representations in its advertising and packaging that World's Best was "Flushable", "Septic Safe" and NSF-certified caused consumers to believe that those statements were true;
- f. Whether the Kent Defendants misrepresented to consumers the true nature of the World's Best products offered for sale;
- g. Whether the Kent Defendants' false and/or misleading statements of fact and concealment of material facts, had the capacity, tendency or were likely to deceive the public.
- h. Whether, by its misrepresentations as set forth herein, the Kent Defendants have engaged in unfair or unlawful business practices in the conduct of trade or commerce with respect to the advertising, marketing and sale of World's Best Cat Litter;
- i. Whether, by its misrepresentations as set forth herein, the Kent Defendants have engaged in unfair, deceptive, unconscionable, untrue or misleading advertising of World's Best Cat Litter;
- j. Whether the Kent Defendants breached their implied warranty of merchantability;
- k. Whether Defendant NSF participated in the breach of implied warranty;

- l. Whether Plaintiff and the Class have been damaged by the unlawful actions of Defendants and the amount of damages to the Class;
- m. Whether the Kent Defendants were unjustly enriched by their deceptive practices; and
- n. Whether all Defendants should be enjoined from continuing the conduct complained of herein.

48. The claims of Plaintiff are typical of the claims of the Members of the Class. Plaintiff has no interests antagonistic to those of the Class, and Defendants have no defenses unique to Plaintiff.

49. Plaintiff will fairly and adequately protect the interests of the Class, and has retained attorneys experienced in class and complex litigation.

50. A class action is superior to other available methods for the fair and efficient adjudication of this controversy. The prosecution of individual remedies by Members of the Class is economically impractical because the amounts that may be recovered by individual members would be insufficient in amount to support separate actions. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently, and without the unnecessary duplication of effort and expense that numerous individual actions would engender. Class treatment of common questions of law and fact would also be superior to multiple individual actions or piecemeal litigation in that class treatment will conserve the resources of the Court and the litigants, and will promote consistency and efficiency of adjudication.

51. Plaintiff does not anticipate any difficulty in the management of this litigation.

CAUSES OF ACTION

COUNT ONE

BREACH OF THE IMPLIED WARRANTY OF MERCHANTABILITY

(Against All Defendants on Behalf of the Nationwide Class)

52. Plaintiff and Class Members repeat and reallege each and every allegation above, as if fully set forth herein.

53. Plaintiff brings this Count individually and on behalf of the Members of her Class against all Defendants.

54. The Kent Defendants, as the designers, manufacturers, marketers, distributor and sellers, impliedly warranted that the World's Best products were fit for their intended purpose, in that they would be "Flushable" and "Septic Safe". Such Defendants did so in order to induce Plaintiff and Members of her Class to purchase the World's Best products and to do so at a premium.

55. Defendant NSF impliedly warranted that World's Best products were fit for their intended purpose, in that they were certified "Flushable" and "Septic Safe." NSF made these representations and warranties with knowledge of the falsity of those representations, or recklessness or negligence towards their truth. NSF, by consenting to the use of its logos and marks, was an integral participant in the Kent Defendants' representations and warranties regarding World's Best products.

56. The Kent Defendants breached their implied warranties in the contract for the sale of World's Best because the products are not "Flushable" and "Sewer Safe".

57. In reliance upon all Defendants' professed expertise, their explicit representation of skill and judgment and the implied warranties discussed above, Plaintiff and the Class

Members purchased the World's Best products and flushed the product as they were led to believe was safe.

58. The World's Best products were not altered by Plaintiff and Class Members.

COUNT TWO

UNJUST ENRICHMENT

(Against the Kent Defendants on behalf of the Nationwide Class)

59. Plaintiff and the Class Members repeat and reallege each and every allegation above, as if fully set forth herein.

60. Plaintiff brings this count individually and on behalf of the Members of her Class against the Kent Defendants.

61. Plaintiff and the Class Members conferred a benefit on the Kent Defendants by purchasing the World's Best products.

62. The Kent Defendants have been unjustly enriched in retaining the revenues derived from the Plaintiff's and the Class Members' purchases of World's Best, which retention under these circumstances is unjust and inequitable because such Defendants misrepresented the facts concerning their products and caused Plaintiff and the Class Members to lose money and/or to overpay as a result thereof.

63. Plaintiff and the Class Members were injured as a direct and proximate result of the Kent Defendants' breaches and the conduct hereinbefore complained of because they would not have purchased World's Best, or would not have paid a premium price for the products, nor have incurred plumbing expenses if the true facts had been known. Because the Kent Defendants' retention of the benefits conferred on them by the Plaintiff and the Class Members is unjust and inequitable, the Kent Defendants must pay in restitution to Plaintiff and the Class Members all such unjustly collected monies as may be ordered by the Court.

COUNT THREE

**VIOLATION OF THE IOWA PRIVATE RIGHT OF ACTION
FOR CONSUMER FRAUDS ACT**

(Against the Kent Defendants on behalf of the Nationwide Class)

64. Plaintiff repeats and realleges each and every allegation above, as if fully set forth herein.

65. Plaintiff and each member of the Class are “persons” and “consumers” within the meaning of Iowa Code §714H.2.

66. Plaintiff and each member of the Class purchased World’s Best products primarily for personal, family or household purposes.

67. Clearly marked on the packages of World’s Best purchased by Plaintiff and Class Members is the representation that the product is “Flushable,” “Sewer Safe,” and NSF certified.

68. The Kent Defendants made these representations when they possessed no reasonable basis in fact to substantiate the representations. Such representations, claims and assertions of fact in their advertising led Plaintiff and the Class Members to conclude, and would cause a reasonable consumer to so conclude, that the representations were true.

69. With such representations, the Kent Defendants knowingly represented, falsely, that the World’s Best products that they were selling met such performance expectations. Such false representations were unfair and deceptive acts or practices in violation of Iowa Code §714H.3.

70. As a direct and proximate result of the Kent Defendants’ unfair and deceptive representations, Plaintiff and other Members of the class have been misled, deceived, and have suffered ascertainable losses.

COUNT FOUR

NEGLIGENT MISREPRESENTATION

(Against All Defendants on Behalf of the Nationwide Class)

71. Plaintiff repeats and realleges each and every allegation above, as if fully set forth herein.

72. Upon information and belief, Defendant NSF offered a Flushable Consumer Products Certification program, where it purported to test and certify that consumer products, besides toilet paper, would be safely flushable down standard toilets. NSF represented that certified flushable products were safe for septic systems, sewer systems, and municipal sewage and wastewater systems.

73. Upon information and belief, the Kent Defendants offered World's Best products for Defendant NSF's flushability certification program. Defendant NSF certified the World's Best products to be flushable, or permitted Kent Defendants to claim such certification.

74. Defendant NSF's flushable certifications were false or misleading statements of fact. The products so certified were not safe for flushing, as municipalities all over the United States have learned, to great public detriment.

75. All Defendants made these false or misleading statements about the flushability of World's Best products, with recklessness or negligence towards the truth of those statements.

76. Plaintiff and the Class Members justifiably relied on the NSF certification and the Kent Defendants' misrepresentations, to their detriment.

77. The Kent Defendants continued to misrepresent the fact that World's Best was NSF certified and flushable after they knew, or should have known, that their claims were false.

78. Defendant NSF, as an independent, accredited public health and safety organization, owed a duty of reasonable care to Plaintiff and the Class Members.

79. The Kent Defendants, as manufacturers and distributors of World's Best, were in a superior position of knowledge about the product and owed a duty of reasonable care to Plaintiff and to the Class Members.

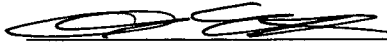
80. All Defendants breached that duty of reasonable care.

81. As a foreseeable and proximate result of all Defendants' breach of duty, Plaintiff and the Class Members suffered damages.

WHEREFORE, Plaintiff Miller, on behalf of herself and the Class, demand judgment against all Defendants for the actual losses suffered, a declaratory judgment that all Defendants' practices violate enacted consumer protection statutes, an order enjoining all Defendants from further violations, compensatory damages to be determined by a duly impaneled jury, for prejudgment interest thereon, for the costs of the action and for reasonable attorney fees.

Plaintiff Miller further prays for an order declaring this action to be a class action properly maintained pursuant to Rule 23 of the Ohio Rules of Civil Procedure and further certifying herself as Class Representative and her counsel as Class Counsel. Plaintiff further prays for such other legal or equitable relief as may be just and proper.

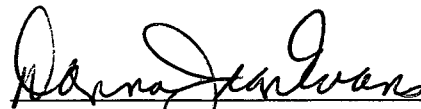
Respectfully submitted,



Dennis E. Murray, Sr., Esq. (0008783)
dms@murrayandmurray.com
Donna J. Evans, Esq. (0072306)
dae@murrayandmurray.com
MURRAY & MURRAY CO., L.P.A.
111 East Shoreline Drive
Sandusky, Ohio 44870
Telephone: (419) 624-3000
Facsimile: (419) 624-0707

JURY DEMAND

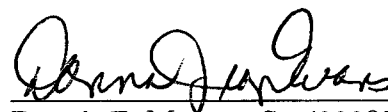
Plaintiff hereby demands a trial as to all causes of action and issues so triable.



Dennis E. Murray, Sr., Esq. (0008783)
MURRAY & MURRAY CO., L.P.A.
Attorneys for Plaintiffs

INSTRUCTIONS TO THE CLERK:

Please cause to be served upon all Defendants a copy of the Complaint. Said service is requested by Certified Mail.



Dennis E. Murray, Sr. (0008783)
Donna Jean Evans (0072306)
MURRAY & MURRAY CO., L.P.A.
Attorneys for Plaintiffs



CHOOSE MY FORMULA

HASSLE-FREE CAT CARE*

OUR COMMUNITY

WHERE TO BUY

OUR COMMUNITY

Overview

What People Are Saying

What Retailers Are Saying

Product Reviews

GiveLitter™

Clearing the Air | Blog

News & Media

BLOG SEARCH

SEARCH

SUBSCRIBE

Name

Email *

Subscribe

ARCHIVES

2015 (10)

2014 (27)

2013 (22)

2012 (24)

2011 (30)

2010 (52)

2009 (28)

CLEARING THE AIR

Delivering the web's latest and greatest cat care advice, news and entertainment

July 11, 2014

Is World's Best Cat Litter™ Flushable?



BACK TO BLOG HOME

World's Best Cat Litter™ has always been flushable*, but we are proud to announce the completion of NSF testing that proves you can flush our concentrated corn-based formula down your toilet. Unlike clay-based litters, World's Best Cat Litter™ harnesses the concentrated power of corn so you can avoid filling your trash with bags of soiled litter. Simply scoop, flush and move on with your day! Let's flush out the details a little more shall we?

Clay Litter Isn't Flushable

Traditional dumping clay litters are made from bentonite clay—which forms a cement-like compound in water. Flushing clay litter may clog pipes and can damage septic systems. That means endless trips to the trash for you, and a whole lot of clay litter in landfills—where it sits for a very long time.

Easy Clean-Up with Flushable World's Best Cat Litter™

World's Best Cat Litter™ is made from renewable, planet-friendly corn—not clay. Our six natural formulas are quick clumping for easy scooping so you don't have to chisel or scrape the litter box. And when you're in a rush, you can flush World's Best Cat Litter™. It's the simple way to dispose of used litter.

Tested Flushable and Septic-System Safe by NSF

NSF is the public health and safety organization that tests consumer products for flushability. World's Best Cat Litter™ went through a rigorous testing process to make sure that our litter won't clog pipes, sewers, or septic systems when flushed. Learn more about how NSF tests products for flushability.

Flushable Cat Litter: One More Reason to Get Away From Clay

You need a litter box solution that's simple, sustainable, and safe for your pets and family. Learn more about how flushable World's Best Cat Litter™ helps clean up the dirtiest job in cat care!

**The State of California encourages the disposal of cat feces in trash and discourages flushing feces in toilets or disposing of them in drains.*

12 Comments Clearing The Air

Login

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Sort by Best



Join the discussion



Sue

Is there a limit to how much you can flush? I have 2 cats that are very frequent visitors to the litter box...

2

Reply



worldsbestcatlitter Mod

Hi Sue,

We recommend 1-2 clumps at a time. Thank you for using World's Best Cat Litter!

EXHIBIT

1



PRICE

#1199



WORLD'S BEST CAT LITTER™

— CONCENTRATED POWER FOR —
LONG LASTING PERFORMANCE



QUICK CLUMPING

**OUTSTANDING
ODOR CONTROL**

99% DUST-FREE

CLUMPING FORMULA

NET WT 14 LB
(6.35 KG)



**WORLD'S BEST
CAT LITTER**

**EXHIBIT
2**



\$14.99



WORLD'S BEST CAT LITTER™

CONCENTRATED POWER FOR
LONG LASTING PERFORMANCE

QUICK CLUMPING

OUTSTANDING
ODOR CONTROL

99% DUST-FREE



CLUMPING FORMULA

NET WT 14 LB
(6.35 KG)

12 Comments Clearing The Air

Login

Recommend 1 Share

Sort by Best



Join the discussion...



Sue • 4 months ago

Is there a limit to how much you can flush? I have 2 cats that are very frequent visitors to the litter box...

2 • Reply • Share



worldsbestcatlitter Mod • Sue • 4 months ago

Hi Sue,

We recommend 1-2 clumps at a time. Thank you for your question and thank you for using World's Best Cat Litter!

• Reply • Share



Julianne • 5 months ago

Ditto Jonathan's comment. No sticker on my bag either. You should change your packaging because you'll lose customers who only buy flushable cat litters, and will assume your litter isn't flushable because it's not marked anywhere.

1 • Reply • Share



worldsbestcatlitter Mod • Julianne • 5 months ago

Hi Julianne, thank you for your comment. Our packaging is being updated so flushable stickers will appear on all future packaging as it is updated and released. Thank you for purchasing World's Best Cat Litter!

• Reply • Share



Jonathan Lefrançois • 5 months ago

Hello. I am happy to read this but am wondering why it is not marked anywhere on the bag?

1 • Reply • Share



worldsbestcatlitter Mod • Jonathan Lefrançois • 5 months ago

Hi Jonathan, currently, we do have stickers located on the front top portion of our bags that notify that the litter is flushable. If for whatever reason you see or have a bag that does not have this sticker, please be assured all of our litter is flushable and safe for both sewers and septic systems.

4 • Reply • Share



Quinn • 6 days ago

I just tried flushing it and it clogged my toilet..... now the water isn't refilling as fast. I am pretty nervous that I messed up my plumbing..

• Reply • Share



Will • 2 months ago

Is there a limit to how often (how many times per day, say?) you can flush litter down the toilet? In other words, should we be in the habit of flushing all cat poop down the toilet?

• Reply • Share



worldsbestcatlitter Mod • Will • 2 months ago

Hi Will,

There should be no daily limits on the number of times you can flush litter down the toilet. Because it is a food-based product (made with the concentrated power of corn), it is safe for most* toilets and septic systems!

*The State of California encourages the disposal of cat feces in trash and discourages flushing feces in toilets or disposing of them in drains.

• Reply • Share



Hank • 3 months ago

Is the ADVANCED NATURAL PINE BLEND also ok to flush?

• Reply • Share



worldsbestcatlitter Mod • Hank • 3 months ago

Hi Hank,

**EXHIBIT
3**

didn't know whether to purchase because of the price but after using a supermarket wood pellet litter and having to change it almost every other day was costing a lot. My cat took to it straight away and it clumped amazingly and didn't stick to the bottom of the tray, I managed to pick out the clumps with a scoop without trouble no smell at all. It does track a little if u have a cat that likes to dig around for ages but isn't painful if trodden on unlike the silica crystals. I will definitely be purchasing the bigger bag of this as well as a covered litter tray to help with tracking it's definitely worth the price and zoo plus is a great place to buy it from excellent delivery service

(12/04/15)

[Back to World's Best Cat Litter Extra Strength ▶](#)

☆☆☆☆☆

I Love it!!

... if it wasn't for the price I would settle for this litter forever! I use it in a litter box with filters. After trying Tigerino silica (ok for me) and Cat's best Nature gold (it was really bad... falling apart every time) I am ecstatic with the clumping power of this one. It has quite fine grains, leaving a nice clump which sticks very well together and doesn't contaminate the rest of the litter. All the excess sand falls through the scoop very well, making it very efficient. even the poo gets well "coated" so it doesn't smell (I had serious problems with Cat's Best on this). the litter itself might have a slightly stronger smell, but no comparison with the smell of poo that you would get otherwise (despite the filters). The excellent clumping means that it stays clean, so you will have to use less of it and just add some every once in a while. I think this would work very well with one of those "self cleaning litter boxes" that needs spinning. One more thing.. all the litters i have tried leave tracking. I think my siberians just have big paws! If you can afford it, I can't praise this enough.

Laura (25/03/15)

[Back to World's Best Cat Litter Extra Strength ▶](#)

☆

Many Americans won't flush this litter away

In the State of California, it is illegal to flush litter down the toilets so this product can't be used there in that manner. According to websites, other-Americans have reported clogging of their sanitary systems when trying to flush TWBCL down the toilet. Do NOT buy this litter on the strength it "may simply be flushed down the toilet" - IT CAN'T!! I previously reviewed this product as excellent when I first used it. It's NOT excellent. I have just spent over £200 to have my drains unblocked because they were solidly blocked up to the level of the manhole covers with this cat litter which the Zooplus website claims can be simply flushed away in the toilet. Since using it, I have been putting ONE scoopful at a time of clumped litter down the toilet and each scoopful has been followed by a 9 litre bucket of water AND a full flush of the 10 litre toilet cistern. Flushing away the litter has led to a COMPLETE blockage of my drainage system caused by a build-up of flushed litter. I can assure readers that the toilet is not otherwise used for anything else other than human waste and therefore the blockage was solely the result of flushing away The World's Best Cat Litter as confirmed by the drainage engineer. I have reported this occurrence to Zooplus Customer Services for THEM to advise the manufacturer that the product does not do what it claims in this respect and guess what? They didn't reply! If you are considering purchasing on the strength this cat litter can be flushed away, as I did when first making my purchase, DON'T unless you are prepared to spend hundreds of pounds getting your drains unblocked. If current users have

experienced the same problems, tell Zooplus: it is their responsibility - not yours - to advise the manufacturer of the cat litter failings and insist their claim for flushing away in the toilet is immediately removed. Zooplus should also remove this claim from its website with immediate effect as it is completely misleading and inaccurate and contravenes Advertising Standards regulations.

Lyon Murray (21/03/15)

[Back to World's Best Cat Litter Extra Strength ▶](#)

☆☆☆☆

Not dust-free but excellent otherwise

I wouldn't call this litter "dust-free" because, as good as the clumping is, the granules do break down into a powder as with most other litters, so I get dusty pawprints on my sofa. However, the clumping IS excellent, it's flushable, and there's relatively little granule tracking. I've tried Sanicat silica, Oko plus, supermarket clay, and this is definitely the best yet. I've got a big boy who makes enormous poos and a little girl who is very fussy about her tray and this seems to keep them both happy.

Shreena (17/02/15)

[Back to World's Best Cat Litter Extra Strength ▶](#)

☆☆☆☆

Excellent

Purchase price may be higher than some but you get what you pay for and this is longer lasting than some others. Odour free and easy to scoop. Whilst the vendor advises that some cats may prefer gradual change from their previous litter, because of silica concerns about respiratory issues we changed all 4 litter trays 100% in one fell swoop. No problems at all.

(14/01/15)

[Back to World's Best Cat Litter Extra Strength ▶](#)

☆☆☆☆

Definately the Best !

I look after cats for a living and have come across lots and lots of different litters. I really do think this is the best and recomend it to all. The clumps just lift out and can be flushed down the loo. I don't have to spend time brushing all the escaped litter bits outside the tray. I have only ever had one comment from a customer that there cats liked to eat it rather than use it but thats it ! My cat loves it and so do I !

hapticat.co.uk (19/11/14)

[Back to World's Best Cat Litter Extra Strength ▶](#)

☆☆☆☆

Great cat litter

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Pet Supplies Brands Bestsellers Markdowns Dogs Cats Small Animals Fish & Aquatics Birds Reptiles Subscribe & Save Top Deals

Customer Review

1 of 1 people found the following review helpful

★★★★★ **After 2 months of use, could not wait to get rid of it.**, February 3, 2015

By **Laurana**

Verified Purchase (What's this?)

This review is from: **WORLD'S BEST CAT LITTER 391032 Clumping Litter Formula 28-Pound (Misc.)**

I got this litter to replace the Petco Crystal litter that for some reason is not available anymore.

I really wanted to like World's Best, but I just could not wait to get rid of it after 2 months of using it.

Reasons:

1) Tracking and dust: What annoyed me the most was by far the tracking and the dust. Granted my cat is a digger, has long hair and big paws, and does tend to track litter, but this was way more than any other litter I had tried before. The stuff was just everywhere. I had to sweep the floor twice a day, and had to fully clean my apartment three times as often as I usually did before. Every time he used the litter box (closed litterbox with a lid placed in a corner of the living room), he came out with dust all over his paws and face, walked to one of the rugs, and opened his paws to release tons of little corn bits all over the place. He had to clean himself so much more to get rid of the dust, and very often would walk on furniture and leave dust marks on my couches, rugs and bed.

2) "Flushable": I was flushing the litter as suggested, until my toilet got horribly clogged. The plumber said there was a huge plug somewhere deep down and it took him a lot of effort to remove. He urged me not to throw anything but toilet paper in there. I stopped flushing the litter. I don't know if it was the only reason for the clog but I'm sure it contributed since I had not had this problem before.

3) Smell: the smell of the actual unused litter did not bother me at all. However, after a week of use, I could smell it in the entire apartment. This litter needs daily or bidaily cleaning, which I don't mind at all and did do, but the smell would persist. I could tell that the cat was not happy with this either. He would dig for a long while before coming out of the box.

4) Length of use: I had to change it much more often than litters I used in the past, especially because of the smell. I felt like I was wasting more time and money than I did before.

Yes it's natural, and it reassured me that my cat was munching on corn bits instead of crystals or clay, and yes, it clumps very well and you can remove pee really easily, but that's pretty much all I liked about it. I clean the entire box every time I change the litter, so really the pee at the bottom of the box has never been a huge issue for me. What drove me nuts was the corn bits EVERYWHERE.

I think it really depends on the person ultimately. I for instance hate wasting my time cleaning my apartment more often than I have to just for litter, and have a very sensitive nose so smell can be a big issue for me. However I don't mind cleaning the box entirely at every change, and don't really care for clumping properties that much. I know other cat owners may absolutely need to litter to clump for them to feel it's a good and easy litter to use.

I was doing well with the crystal litter. It didn't clump, but pee was absorbed very well as long as there was enough litter in the box and that it was changed as needed (which was much less often than World's Best needed). There were some crystals tracked but seriously insignificant, and there was only some dust when I poured the crystal litter from the bag into the box.

There was NO SMELL at all. I'm pretty sad that it's not available anymore.

I just switched to a recycled paper litter. Tracking is virtually non-existent so that's an awesome start for me. I'll have to wait and see for the smell and absorbance.

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Was this review helpful to you? ☒ Yes ☐ No

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Review Details

Item



**WORLD'S BEST CAT LITTER
391032 Clumping Litter
Formula 28-Pound**

★★★★★ (561 customer reviews)

5 star	86%
4 star	12%
3 star	5%
2 star	7%
1 star	10%

\$39.29

[Add to Cart](#)

[Add to Wish List](#)

22 used & new available
from \$19.99

Reviewer



Laurana

Top Reviewer Ranking: 1,863,048
[See all 9 reviews](#)



United States of America
FEDERAL TRADE COMMISSION
Washington, DC 20580

Division of Advertising Practices

November 9, 2011

Dwight D. Lueck
Barnes & Thornberg LLP
11 South Meridian Street
Indianapolis, IN 56204

Re: Kent Nutrition Group, Inc., File No. 112-3161

Dear Mr. Lueck:

The staff of the Federal Trade Commission's Division of Advertising Practices has conducted an investigation into whether your client, Kent Nutrition Group, Inc., violated Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, in connection with its promotion and advertising for its product, World's Best Cat Litter™ ("WBCL"), following a referral from the National Advertising Division of the Council for Better Business Bureaus. Our inquiry focused on Kent's claims that WBCL is biodegradable, flushable, and septic-safe. Section 5 of the FTC Act requires that advertising claims be truthful and non-misleading. In addition, certain types of claims, such as environmental benefit claims, require that an advertiser possess competent and reliable scientific evidence substantiating the claims, prior to dissemination. We were concerned that Kent's biodegradable, flushable, and septic-safe claims were not adequately substantiated.

Specifically, Kent claimed that WBCL was biodegradable and its promotional materials did not define, describe, or qualify the biodegradable claim. Although the advertising and packaging also stated that the product was flushable, this claim did not modify the biodegradable claim; i.e., it did not state the product is biodegradable only when flushed. Accordingly, consumers may have reasonably believed the product was biodegradable whether it was flushed or thrown away with the regular trash. The FTC's Guides for the Use of Environmental Marketing Claims, 16 C.F.R. Part 260 ("Green Guides"), explain that "[a]n unqualified claim that a product or package is degradable, biodegradable or photodegradable should be substantiated by competent and reliable scientific evidence that the entire product or package will completely break down and return to nature, i.e., decompose into elements found in nature within a reasonably short period of time after customary disposal." 16 C.F.R. § 260.7(b). We believe that the customary method of disposal for cat litter is trash disposal. If consumers dispose of the cat litter in their regular trash, this disposal method does not present conditions that would allow for the cat litter to biodegrade.¹

¹ Approximately 91 percent of total municipal solid waste in the United States is disposed of in either landfills, incinerators, or recycling facilities.

2 | Page

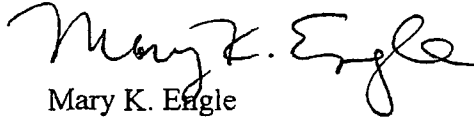
Dwight Lueck, Esq.

~~Kent also claimed that WBCL was flushable and septic-safe. To adequately substantiate such claims, an advertiser must possess and rely upon testing that addresses consumers' reasonable and expected usage of the product, which here would include daily flushing of cat litter potentially for years, and the effects of long-term, large-scale introduction of cat litter waste into individual septic or wastewater treatment systems.~~

Upon careful review of this matter, including non-public information submitted to the staff, we have determined not to recommend enforcement action at this time. Among the factors we considered is your decision to take steps to address the concerns expressed by the FTC staff. ~~First, you informed us that Kent has ceased making biodegradable, flushable, and septic-safe claims on its website and in point-of-sale materials, and is taking steps to remove these claims from WBCL packaging.~~ Second, you informed us that Kent has contracted with an outside expert to conduct additional testing of WBCL and will only resume these claims if the testing results support them. The FTC staff expects that Kent will carefully review its claims and substantiation to ensure all future advertising complies with the FTC Act.

Our decision not to pursue enforcement action is not to be construed as a determination that a violation may not have occurred, just as the pendency of an investigation should not be construed as a determination that a violation has occurred. The Commission reserves the right to take such further action as the public interest may warrant.

Very truly yours,



Mary K. Engle
Associate Director

cc: Andrea Levine
National Advertising Division
70 W. 36th Street, 13th Floor
New York, NY 10018



CHOOSE MY FORMULA

HASSLE-FREE CAT CARE*

OUR COMMUNITY

WHERE TO BUY

HASSLE-FREE CAT CARE®

Overview

Usage Instructions

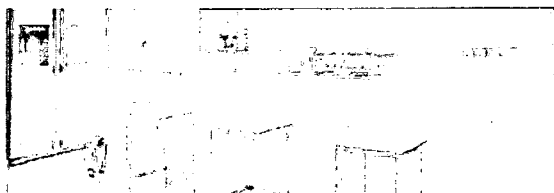
Litter Box Tips

It's Just Litter Until™

Reasons to Switch

Clayfessionals

7 REASONS TO SWITCH TO WORLD'S BEST CAT LITTER™

YOU'RE TIRED OF THE MESS

World's Best Cat Litter™ makes it easy to keep your home clean and free of nasty pet smells. All of our formulas deliver outstanding odor control, quick clumping, easy scooping, and long lasting performance. And because they are Septic and sewer safe, you can simply scoop and flush*. Learn more >

**YOU VALUE
PERFORMANCE & SAFETY**

World's Best Cat Litter™ helps you protect that which is most precious to you — your family! Our safe formulas are made of all-natural ingredients and contain no artificial chemicals, perfumes or silica dust!

**YOU BELIEVE IN
SUSTAINABLE PRODUCTS**

World's Best Cat Litter™ offers outstanding performance by harnessing the natural absorbency of 100% sustainable corn.

**YOUR SATISFACTION
IS GUARANTEED**

World's Best Cat Litter™ offers a money-back guarantee if you aren't completely satisfied with any of our all-natural formulas. Read our guarantee >

**YOU SUPPORT
PET ADOPTION**

World's Best Cat Litter™ helps pet parents give back with a GiveLitter™ charity that has donated more than 200,000 lbs. of free litter to animal shelters across the United States. Click to GiveLitter™ >

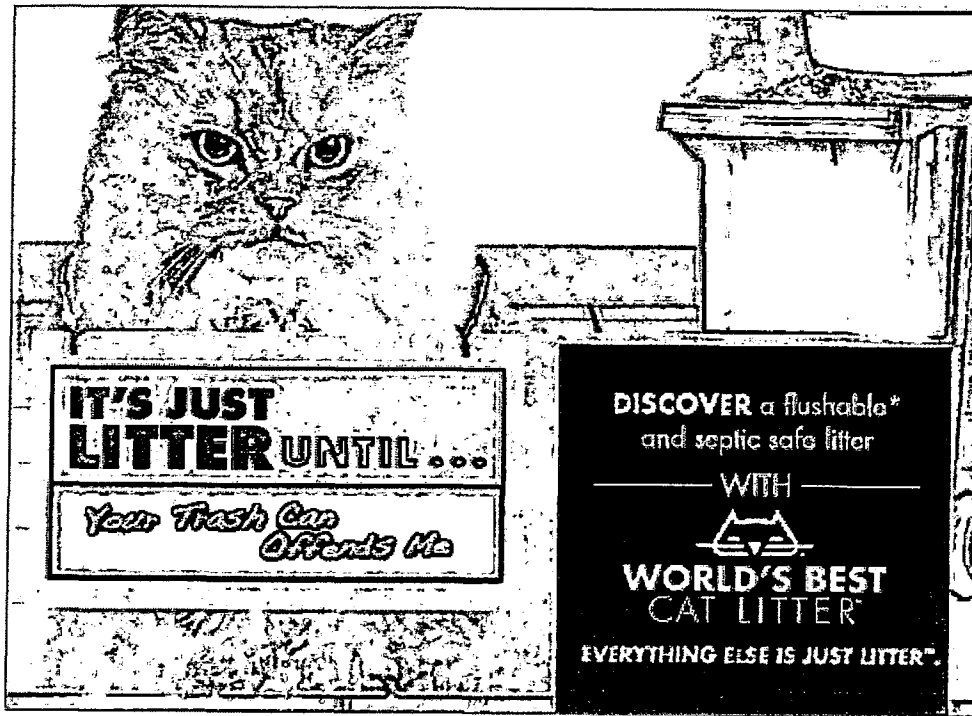
**YOU TRUST
REAL PET PARENTS**

World's Best Cat Litter™ is more than just a name. We define success by the thousands of customers who have thanked us for helping them solve their litter box problem. Read what people are saying >

**YOU WANT TO SAVE
TIME & MONEY**

World's Best Cat Litter™ uses the concentrated power of corn to deliver a long-lasting litter that saves you money at the register and time when cleaning the box. Learn more >

*The State of California encourages the disposal of cat feces in trash and discourages flushing feces in toilets or disposing of them in drains

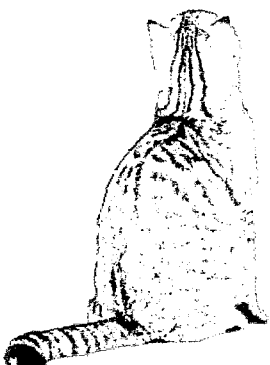



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CHOOSE MY FORMULA

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[Advanced Natural Pine Blend](#)
[Our Difference](#)
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FREQUENTLY ASKED QUESTIONS ABOUT:



GENERAL QUESTIONS

How did World's Best Cat Litter™ get its name?

What formulas of World's Best Cat Litter™ are available?

What are the differences between Original Series and the Advanced Natural formulas?

How is World's Best Cat Litter™ environmentally friendly?

Is World's Best Cat Litter™ safe for cats, people and the environment?

How does World Best Cat Litter™ offer concentrated power and how does it benefit me?

Is World's Best Cat Litter™ flushable*?

Yes! All World's Best Cat Litter™ formulas have undergone rigorous testing to confirm they are sewer and septic safe. Unlike clay-based litters, World's Best Cat Litter™ harnesses the concentrated power of corn so you can simply scoop, flush* and move on with your day!

*The State of California encourages the disposal of cat feces in trash and discourages flushing feces in toilets or disposing of them in drains.

Is World's Best Cat Litter™ more expensive than other litters?

Is World's Best Cat Litter™ safe for kittens?

How often do I need to completely change the litter in the box with World's Best Cat Litter™?

Who produces World's Best Cat Litter™?

Where is World's Best Cat Litter™ available?

Is World's Best Cat Litter™ tested on animals?



CHOOSE MY FORMULA

HASSLE-FREE CAT CARE®

OUR COMMUNITY

WHERE TO BUY

HASSLE-FREE CAT CARE®[Overview](#)[Usage Instructions](#)[Litter Box Tips](#)[It's Just Litter Until™](#)[Reasons to Switch](#)[Clayfessionals](#)**LESS HASSLE,
MORE TIME FOR YOURSELF.**

To Do List:

- Get Oil Changed
- Empty Dishwasher
- Clean Litter Box
- Get a Massage!

**SIMPLIFYING THE DIRTIEST JOB IN CAT CARE!**

World's Best Cat Litter™ is dedicated to simplifying the dirtiest job in cat care, so you can spend less time cleaning the litter box and more time doing the things that you enjoy.

We are the ONLY cat litter that harnesses the concentrated power of corn to help you maintain a cleaner litter box. All of our long lasting formulas promise odor control, quick clumping and easy scooping. All of our formulas are septic and sewer safe so you can simply scoop, flush* and move on with your day! Our renewable corn-based litters contain no silica dust and are safe for pets, people and the planet!

World's Best Cat Litter™ truly is your **LITTER BOX PROBLEM SOLVED™**.

**USING WORLD'S BEST
CAT LITTER™**

View our recommended steps to follow when switching to World's Best Cat Litter™.

LITTER BOX TIPS

Learn tips on keeping your litter box clean and hassle-free with Melissa Brookshire, DVM.

TIP #1
Keep the Litter Box Clean

REASONS TO SWITCH

Check out just a few of the many reasons to switch to World's Best Cat Litter™.



*The State of California encourages the disposal of cat feces in trash and discourages flushing feces in toilets or disposing of them in drains.

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OUR COMMUNITY

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CLEARING THE AIR

Delivering the web's latest and greatest cat care advice, news and entertainment.

July 11, 2014

Is World's Best Cat Litter™ Flushable?


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World's Best Cat Litter™ has always been flushable*, but we are proud to announce the completion of rigorous NSF testing that provides you with further confidence that all our formulas are safe for both sewers and septic systems! Unlike clay-based litters, World's Best Cat Litter™ harnesses the concentrated power of corn so you can avoid filling your trash with bags of soiled litter. Simply scoop, flush and move on with your day! Let's flush out the details a little more shall we?

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**The State of California encourages the disposal of cat feces in trash and discourages flushing feces in toilets or disposing of them in drains.*

12 Comments

Clearing The Air

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Join the discussion...



Sue • 4 months ago

Is there a limit to how much you can flush? I have 2 cats that are very frequent visitors to the litter box...

2

Reply • Share



worldsbestcatlitter Mod • 4 months ago

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Broward County > Water Services > No Frog. No Clog.

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Rates and Fees
Water Sewer Service Provider Locator
Water & Wastewater Engineering
Water Management
WWS Capital Construction Projects
WWS Land Development
WWS Minimum Design and Construction Standards
WWS Utility Connection Permit

No Frog. No Clog.

Help prevent sewer clogs in your neighborhood.

Sewage is used water and wastes discharged by a community and collected from the drains of sinks, showers, toilets and laundry facilities and flows into sewer lines, or collection systems, from the drains in homes and businesses. From the sewer lines, it is then transported to a sewage treatment facility.

Sewers back up when sewage collection lines get clogged by items flushed down toilets and drains such as **Fats, Rags Oil and Grease (FROG)** that get caught in the line and plug it up. In addition to the costly repairs, sewer back ups are messy, foul-smelling, and pose a serious public health threat.

- Only feces, urine and toilet paper should be flushed down the toilet.
- Other drains should be only used to dispose of used water and soaps from cleaning.

Never flush down the toilet or drain:

- Fats, cooking oil or grease
- Motor oil
- Disposable diapers and baby wipes
- Disinfectant wipes
- Cleaning cloths
- Big chunks of garbage
- Cat litter including "flushable" cat litter
- Feminine napkins, tampons and applicators
- Dye (hair /clothing) or tanning solutions
- Flammable products (lighter fluid, acetone)
- Acidic and toxic substances

Proper Disposal Tips

- Throw bulky waste materials in trash.
- Freeze small amounts of fats, oils and grease in a container with a tight-sealing lid and dispose of in trash.
- Mix oil with an absorbent material such as coffee grounds, place in a tightly-sealed container and dispose of in trash.
- Use a strainer in your sink to catch scraps.
- Cover drains with fine screen or catch basket.



Broward Home | Terms of Use

EXHIBIT

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Turnbull Plumbing & Heating, LLC

46661 US Route 20, West

Oberlin, OH 44074

PHONE: 440/ 775-0383

FAX: 440/ 774-6050

Invoice

DATE

INVOICE #

4/29/2015

12497

BILL TO

Jane Miller
71 Glenhusrt Dr
Oberlin, Oh 44074

JOB LOCATION

Jane Miller
71 Glenhusrt Dr
Oberlin, Oh 44074

TERMS**DUE DATE**

Net 30

5/29/2015

DESCRIPTION	AMOUNT
4/24/15 Sewer back-up. Ran sewer machine through both stacks on roof. Also ran camera, could not locate sewer cleanout. Removed something latex/rubber/plastic? and cat waste/litter from line. Sewer and camera charges	420.00
4/29/15 Sewer. Snaked line from roof - cat waste and litter. Sewer charge	165.00

PAYABLE UPON RECEIPT****Please pay from this invoice****

Amounts over 30 days are subject to 2% finance charge
per month (24% annual percentage rate) Minimum charge \$5.00

Total**\$585.00****EXHIBIT****7**

May 20, 2015

Jane Miller
71 Glenhurst Dr.
Oberlin, OH 44074

Dear Jane,

Thank you for contacting us and sharing your feedback regarding the plumbing issues you have recently experienced. After thorough review of the bill provided from Turnbull Plumbing & Heating (copy enclosed), it appears that the cause of the back-up was likely due to "something latex/rubber/plastic" found within the line. For this reason and as stated, we are declining to pay the plumber bill you submitted to us.

Every plumbing system is different; age, set up, etc. can affect the efficiency of a septic or sewer system. For example, tree roots can cause a blockage that would prohibit the litter from passing through the system; although there would be litter in the line, this would not be the fault of the litter. In this occurrence, it appears the litter could not pass through the line due to the blockage created by the foreign material found and then removed.

Consumers have been flushing our products for over sixteen years with great success. We have conducted and completed rigorous testing on our litter in sewers, septic systems and with plumbing in general, which has allowed us to support the claim. If you can provide further documentation showing World's Best Cat Litter™ was the cause of the issue with your plumbing, we will be happy to review it. Documentation can be sent to custserv@worldsbestcatlitter.com or

World's Best Cat Litter™
2905 Hwy 61 N
Muscatoine IA 52761

Please let us know if we can provide any further assistance.

Best regards,

BECKY ANSON
Customer Service Representative
World's Best Cat Litter™ | By Nature™

KENT
Pet Group

bythenaturepetfoods.com

worldsbestcatlitter.com

Kent Pet Group - 2905 N Hwy 61 Muscatine, IA 52761 - p: 567 267-0225 - t: 567 267-0226

EXHIBIT
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